

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 06-_____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>SOK LY MEACH</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>TRI V. NGUYEN</b>	<b>:</b>	<b>21 U.S.C. § 963 (conspiracy to import</b>
<b>DOAI NGUYEN LE</b>	<b>:</b>	<b>MDMA, methamphetamine and</b>
	<b>:</b>	<b>marijuana – 1 count)</b>
	<b>:</b>	<b>21 U.S.C. § 846 (conspiracy to distribute</b>
	<b>:</b>	<b>MDMA, methamphetamine and</b>
	<b>:</b>	<b>marijuana – 1 count)</b>
	<b>:</b>	<b>21 U.S.C. § 846 (attempt to possess</b>
	<b>:</b>	<b>MDMA, methamphetamine and</b>
	<b>:</b>	<b>marijuana with intent to distribute – 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of Forfeiture (18 U.S.C. § 853)</b>

**INDICTMENT**

**COUNT ONE**

**(Conspiracy to Import MDMA, Methamphetamine and Marijuana)**

**THE GRAND JURY CHARGES THAT:**

1. From in or about early March 2006 through on or about March 13, 2006, in the Eastern District of Pennsylvania and elsewhere, defendants

**SOK LY MEACH,  
TRI V. NGUYEN, and  
DOAI NGUYEN LE**

conspired and agreed together, and with other persons known and unknown to the grand jury, to knowingly and intentionally import a mixture and substance containing a detectable amount of controlled substances, specifically 3,4-methylenedioxymethamphetamine, commonly known as

“MDMA” and/or “ecstasy,” a Schedule I controlled substance, and methamphetamine, a Schedule II controlled substance, consisting of approximately 100,000 pills and weighing more than 500 grams, that is weighing approximately 28 kilograms, and a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, into the United States from a place outside thereof, that is, Canada, in violation of Title 21, United States Code, Sections 952(a), 960(a), 960(b)(1)(H) and 960(b)(3).

### **MANNER AND MEANS**

It was part of the conspiracy that:

2. A supplier in Canada, known to the grand jury but not indicted here, made arrangements to sell marijuana and pills containing MDMA and methamphetamine to purchasers in the United States; these arrangements included importing the controlled substances into the United States from Canada.
3. Approximately 35 kilograms of marijuana and approximately 100,000 pills containing MDMA and methamphetamine and weighing approximately 28 kilograms were supplied by the Canadian supplier to defendant SOK LY MEACH and concealed inside his van.
4. Defendant SOK LY MEACH was to drive the controlled substances from Canada, across the international border into the United States, and make delivery to the purchasers or their representatives at such locations as directed by the other co-conspirators.
5. On departure from Canada, defendant SOK LY MEACH was given a cell phone number with a Philadelphia, Pennsylvania area code, and he was instructed to call that number once he passed through customs at the international border and was in the United States.
6. On or about March 11, 2006, SOK LY MEACH drove the van containing the

marijuana and the pills to the Rainbow Bridge Port of Entry at Niagara Falls, New York, and entered into the United States from Canada.

7. On or about March 13, 2006, defendants TRI V. NGUYEN and DOAI NGUYEN LE met in Philadelphia, Pennsylvania with defendant SOK LY MEACH (who, unbeknownst to them, had begun to cooperate with law enforcement on the night of March 11, 2006) with the intention of taking delivery of the drug shipment from MEACH.

8. On or about March 13, 2006, defendants TRI V. NGUYEN and DOAI NGUYEN gave approximately \$20,000 of United States currency to defendant SOK LY MEACH in furtherance of the transportation of the drugs to Pennsylvania.

All in violation of Title 21, United States Code, Section 963.

**COUNT TWO**

**(Conspiracy to Distribute MDMA, Methamphetamine and Marijuana)**

**THE GRAND JURY FURTHER CHARGES THAT:**

From in or about early March 2006 through on or about March 13, 2006, in the Eastern District of Pennsylvania and elsewhere, defendants

**SOK LY MEACH,  
TRI V. NGUYEN, and  
DOAI NGUYEN LE**

conspired and agreed together, and with other persons known and unknown to the grand jury, to knowingly and intentionally distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, and a mixture and substance containing a detectable amount of controlled substances, specifically, MDMA, a Schedule I controlled substance, and methamphetamine, a Schedule II controlled substance, consisting of approximately 100,000 pills and weighing more than 500 grams, that is, weighing approximately 28 kilograms, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 846.

**COUNT THREE**

**(Attempt to Possess Controlled Substances with Intent to Distribute)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 13, 2006, in the Eastern District of Pennsylvania, defendants

**TRI V. NGUYEN and  
DOAI NGUYEN LE**

knowingly and intentionally attempted and aided and abetted an attempt to possess a mixture or substance containing detectable amounts of controlled substances with the intent to distribute them, specifically marijuana, a Schedule I controlled substance, and approximately 100,000 pills, containing MDMA, a Schedule I controlled substance, and methamphetamine, a Schedule II controlled substance, said pills weighing more than 500 grams, that is, weighing approximately 28 kilograms.

In violation of Title 21, United States Code, Sections 841(a)(1) and 846 and Title 18, United States Code, Section 2.

**NOTICE OF FORFEITURE**

**(Drug Trafficking – 21 U.S.C. §§ 846 and 963)**

1. As a result of the violations of Title 21, United States Code, Sections 963 (conspiracy to import MDMA, methamphetamine and marijuana) and Section 846 (conspiracy to distribute MDMA, methamphetamine and marijuana and attempt to possess MDMA, methamphetamine and marijuana with intent to distribute) as set forth in Counts One through Three of this indictment, the defendants

**SOK LY MEACH,  
TRI V. NGUYEN, and  
DOAI NGUYEN LE**

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, the entirety of their interests in: (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations; and (b) any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such violations, including but not limited to:

- (1) \$21,000.00 in proceeds, including but not limited to:
  - (A) \$1,000.00 in United States currency provided to SOK LY MEACH by the Canadian drug supplier on or about March 11, 2006;
  - (B) \$20,000.00 in United States currency seized from SOK LY MEACH on March 13, 2006;
- (2) One green Mercury Villager Van, Ontario license AYAM332; and
- (3) One Silver Acura, Pennsylvania license GDN5497, registered to TRI V. NGUYEN.

2. If any of the property described in paragraph 1, as a result of any act or omission of the defendants,

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or
- (E) has been co-mingled with other property which cannot be divided without difficulty;

then it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in paragraph 1.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

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FOREPERSON

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PATRICK L. MEEHAN  
United States Attorney  
Eastern District of Pennsylvania